CASE 0:13-cv-01336-JNE-TNL Document 26 Filed 11/27/13 Page 1 of 2



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November 26, 2013

Magistrate Judge Tony N. Leung United States District Court 342 U.S. Courthouse 316 North Robert Street St. Paul, MN 55101

RE: Penrod Lane LLC and Ashraf LLC v. COUNTRY Mutual Insurance Company

Court File No: 13-cv-1336 (JNE/TNL)

Insured: Ashraff LLC Claim No.: 175-0017883 Date of Loss: 05/22/11 Our File No. 56727-65

Dear Magistrate Judge Leung:

Pursuant to the Court's Pretrial Scheduling Order, this correspondence sets forth the parties' joint status submission.

COUNTRY served Interrogatories and Request for Production of Documents upon Plaintiffs on October 9, 2013. Plaintiffs provided responses on November 18, 2013. Plaintiffs' counsel indicated that additional documents would be provided. To date, no additional documents have been forwarded. COUNTRY is in the process of analyzing the Answers to Interrogatories and documents produced by Plaintiffs to determine whether additional supplementation is required. It is expected that any request for supplementation of insufficient discovery responses will be served upon Plaintiffs on December 2, 2013.

The parties exchanged Rule 26(a)(1) Initial Disclosures. As part of Plaintiffs' disclosures, Plaintiffs identified a "rent collector" named Darcy Coleman. COUNTRY noticed Darcy Coleman's deposition and attempted to serve a Subpoena upon Darcy Coleman at the address provided by Plaintiffs. The attempts to serve the Subpoena were unsuccessful.

COUNTRY contacted Plaintiffs to obtain an accurate address for Darcy Coleman. It is our understanding that Plaintiffs located a phone number, but that an address has not yet been confirmed. COUNTRY notes that as part of their written discovery responses, Plaintiffs identify Darcy Coleman

November 26, 2013

Page 2

as an individual who provided information utilized in the Answers to Interrogatories. Therefore, it appears that Plaintiffs are in contact with Darcy Coleman. COUNTRY will continue in its efforts to obtain the deposition of Darcy Coleman and any documentation possessed by Coleman that is relevant to this litigation. If Plaintiffs do not agree to voluntarily produce Coleman or otherwise produce accurate contact information for Coleman, COUNTRY intends to proceed with the appropriate motion before this Court.

On November 26, 2013 the plaintiffs served Interrogatories and Requests for Production of Documents upon COUNTRY. Upon Mir Ali's return to the country, COUNTRY intends to proceed with his deposition.

If you have any questions, please contact us.

Respectfully submitted,

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